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June 16, 2021

VIA ELECTRONIC FILING

Honorable Paul A. Crotty
Southern District of New York
500 Pearl Street
New York, New York 10007

5/17/21

Expansion of travel restriction to include the district of New Jersey is granted as requested. Mr. Fishbein may attend the graduation parties, but no overnight stay is permitted. SO ORDERED.

Re: United States v. Paul Fishbein
21 MAG 3643 (UA); 21 CR 296

A handwritten signature in black ink, appearing to read 'Paul A. Crotty', is written over the typed name.

Dear Judge Crotty,

Counsel for Paul Fishbein respectfully submits this letter to request expansion of his travel restriction to include the District of New Jersey. This request arises out of the fact that he has extensive family ties to the state of New Jersey, as well as a specific request for permission for him to travel to New Jersey for two weekends to attend two of his nieces' graduation parties. The first party takes place this weekend, from June 19 through June 20, 2021. This party will take place at the home of his sister, Stacey Ochoa, at 333 Willow Street, Teaneck, NJ. The party begins around 11am on Saturday, with a pool party starting at 7am on Sunday. It is my understanding that Ms. Ochoa is a co-signer on Mr. Fishbein's bond.

The second graduation party takes place the following weekend, again starting around 11am on Saturday, June 26, 2021, and continues with a pool party on Sunday, June 27, 2021. This party will take place at 115 Passaic Avenue, Kearny, NJ, which is the home of his adult niece, Sarah Ayalew. It is my understanding that Ms. Ayalew is a co-signer on Mr. Fishbein's bond.

Due to the cost and time of traveling back and forth on these Saturday evenings, Mr. Fishbein is also requesting to stay overnight at these two locations on their respective Saturdays. The Government, through Assistant US Attorney Sarah Kushner, consents to expanding Mr. Fishbein's

travel restrictions to the District of New Jersey (and more specifically consents to his request to attend these two parties), but does not consent to allowing Mr. Fishbein to stay overnight in New Jersey. It is my understanding that Pretrial also approves of expansion of travel restrictions into New Jersey (as well as his request to attend these parties), but also opposes any overnight stay.

Mr. Fishbein requests Your Honor to expand his travel restrictions to allow him to travel (without permission) into the District of New Jersey, as consented to by both the Government and Pretrial Services. Additionally, Mr. Fishbein requests, over objection of the Government and Pretrial, to allow him to remain overnight on the Saturdays of these graduation parties (6/19-6/20; 6/26-6/27). Not only does Mr. Fishbein have extensive family in New Jersey, but he would be staying at the homes of two of his co-signers, who have every reason not to allow him to abscond. If Mr. Fishbein is permitted to attend these graduation parties, then he would be getting a ride with another sister (whom he lives with) from Far Rockaway, Queens, to New Jersey. His sister is also spending the night, making it more difficult to get back and forth, if he is not permitted to spend the night in New Jersey.

Thank you for your time and attention in this matter.

Respectfully Submitted,

Charles Kaser
Attorney for the Defendant

By: /s/ *Charles Kaser*

CC: all counsel (via ECF)